

EXHIBIT L



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March 9, 2021

VIA E-MAIL - jae@lawjsl.com

Jae Lee, Esq.
JSL Law Offices, P.C.
626 RXR Plaza
Uniondale, New York 11556

Re: Minhye Park v. David Dennis Kim, M.D.
Index No.: 1:20-cv-02636-PKC-LB
Our File No.: 778-1018

Dear Ms. Lee:

As you know, our firm represents Dr. David Dennis Kim in this action. We are in receipt of Plaintiff's First Request for Admission dated February 9, 2021. Unfortunately, we are unable to respond to this document in its current form as it is ambiguous and confusingly drafted. Please note that the caption indicates that it is "Plaintiff's First Request for Admission." However, the only instructions within the document is that our office "produce within twenty days as follows..." This statement is then immediately followed with the title "Interrogatories." The document cannot be responded to because it is contradictory and unclear as to what is sought. Upon information and belief, these are not appropriate inquiries for a Request for Admission and cannot be deemed interrogatories as plaintiff served a separate interrogatory demand and the number of total interrogatories exceeds the limit allowed by the FRCP.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bianca M. Van Deusen".

Bianca M. Van Deusen

BVD/ja

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